

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NICHOLAS MAVIS,

Plaintiff,

vs.

CIVIL ACTION NO.: 3:13-cv-30087-KPN

DIVERSIFIED CONSULTANTS, INC.;
and DOES 1-10, inclusive,

Defendants.

JAMIE DAVIS,

Plaintiff,

vs.

CIVIL ACTION NO.: 1:13-cv-10875-FDS

DIVERSIFIED CONSULTANTS, INC.;
and DOES 1-10, inclusive,

Defendants.

Deposition of

MAVIS-ANN PYE

Taken on behalf of the Plaintiffs
Pursuant to Amended Notices of Taking Deposition

DATE: Friday, February 28, 2014

TIME: 12:15 p.m. - 3:24 p.m.

PLACE: Riley Reporting & Associates, Inc.
1660 Prudential Drive, Suite 210
Jacksonville, Florida 32207

Examination of the witness taken before:

Tanya L. McCranie
Registered Merit Reporter

RILEY REPORTING & ASSOCIATES, INC.
1660 Prudential Drive, Suite 210
Jacksonville, Florida 32207

A P P E A R A N C E S

SERGEI LEMBERG, Esquire,

Lemberg & Associates, L.L.C.,

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appearing on behalf of the plaintiffs.

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appearing via telephone on behalf of the
defendant.

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E X H I B I T S

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Plaintiffs' Exhibit No. 3	
(DCI printout "Pre-collection Services")	20
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1 MAVIS-ANN PYE,
2 having been produced and first duly sworn as a witness on
3 behalf of the plaintiffs, and after responding "I do" to
4 the oath, testified as follows:

5 DIRECT EXAMINATION

6 BY MR. LEMBERG:

7 Q Good morning, Ms. Pye.

8 A Good morning.

9 Q Would you please state your full name for the
10 record.

11 A Mavis-Ann Pye.

12 Q My name is Sergei Lemberg. I represent two
13 plaintiffs in two cases. The first one is Nicholas Mavis
14 and the second one is Jamie Davis, both of which are
15 pending in the United States District Court, Federal
16 District Court for the District of Massachusetts.

17 Have you ever been deposed before?

18 A Yes, I have.

19 Q How many times?

20 A I would say at least seven.

21 Q How many of the seven were personal and how
22 many of the seven were on behalf of Diversified
23 Consultants?

24 A All of them on behalf of Diversified
25 Consultants.

1 the bottom calling on defendant to produce documents.
2 The demands are numbered A through D. Have all of these
3 documents been produced except the campaign definition
4 reports or similar documents that you don't know anything
5 about?

6 A To my knowledge, yes.

7 Q When you qualify "to my knowledge," what does
8 that mean to you?

9 A I provided the information to the attorney and
10 I'm sure he produced it to you.

11 Q Now, let me just understand. What is your
12 position at Diversified Consultants?

13 A I'm the vice president of compliance.

14 Q How long have you been there?

15 A I have been with Diversified since 2005.

16 Q Prior to that, what jobs did you hold for a
17 period longer than a year?

18 A For Diversified?

19 Q For anybody.

20 A I was a compliance manager for Diversified
21 Consultants.

22 Q For how long?

23 A Three years.

24 Q And before that?

25 A I was the quality -- I was a quality

1 Q So Diversified Consultants does not deny that
2 it called both Mavis and Davis to collect a debt,
3 correct?

4 MR. O'CONNOR: Objection to the form.

5 THE WITNESS: Correct.

6 MR. LEMBERG: What's the basis of the
7 objection? Okay, compound. Let me rephrase.

8 MR. O'CONNOR: Form.

9 BY MR. LEMBERG:

10 Q Does Diversified Consultants deny that it
11 called the telephone number assigned to Mr. Davis?

12 A No.

13 MR. O'CONNOR: Objection to the form.

14 MR. LEMBERG: What's the basis of the
15 objection?

16 MR. O'CONNOR: It's improper in form.

17 MR. LEMBERG: What -- why is it improper?

18 MR. O'CONNOR: You have to work that out for
19 yourself, Sergei.

20 MR. LEMBERG: Well, I'm entitled to ask you for
21 the basis of the objection.

22 MR. O'CONNOR: I gave it to you.

23 MR. LEMBERG: You gave -- you repeated what you
24 said. I'm interested in -- what is wrong with the
25 question, Jack?

1 A Roughly 400. It might be high.

2 (Pleadings' Exhibit No. 3 marked for identification.)

3 MR. LEMBERG: I've marked as Pleadings' 3 a
4 printout from what I believe to be Diversified
5 Consultants' Web site. The URL is
6 dcicollect.com/services/dci-pre-collection-services.
7 html. And I'm going to show that printout to the
8 witness.

9 BY MR. LEMBERG:

10 Q Please review this document and tell me when
11 you're ready to answer questions.

12 A I'm ready.

13 Q Does this document appear to be to you a
14 printout from Diversified Consultants' Web site?

15 A It looks like it should be, yes.

16 Q Is it or it is not?

17 A It appears to be, yes.

18 Q The logo in the upper left-hand corner of page
19 1, is that the logo of Diversified Consultants?

20 A Yes, it is.

21 Q And is the name "Diversified Consultants, Inc.,
22 Dedicated to Risk Management" the name and motto of the
23 company?

24 A Yes, it is.

25 Q Does this to you appear to be a page about the

1 pre-collection services that the company provides?

2 A Yes, it does.

3 Q And if you flip the page over, the first full
4 sentence of the second page reads: "With the flexibility
5 available to us via our LiveVox Predictive Dialer, the
6 exceptional functionality of Latitude Software's exciting
7 Latitude Collection System, the high quality training and
8 our motivated employees; DCI possess the resources to
9 take on any -- any project regardless of the complexity
10 or size." Do you see that?

11 A Yes, I do.

12 Q What do the words "our LiveVox predictive
13 dialer" mean to you?

14 A That it is the phone system that we use to make
15 the calls.

16 Q And that's the only phone system you use to
17 make the calls, correct?

18 A Unless it's down, yes.

19 Q Where is that system located?

20 A It's a cloud function.

21 Q What do those words mean?

22 A Meaning that it's off-site, like the cloud is
23 kind of like the Internet. I'm not exactly sure on the
24 terminology used for that.

25 Q And what is LiveVox?

1 A LiveVox is a company that runs the cloud.

2 Q And your firm, Diversified Consultants, uses a
3 LiveVox predictive dialer to make outbound phone calls,
4 correct?

5 A We use a predictive dialer to make phone calls,
6 yes.

7 Q Okay. What do the words "predictive dialer"
8 mean to you?

9 A It means that we predetermine what calls we're
10 going to make and go from there. And the system -- and
11 Jamie and -- the ownership and executives decide which
12 calls are going to be loaded.

13 Q So your understanding of how a predictive
14 dialer works is, correct me if I'm wrong, Diversified
15 decides what numbers are going to be called, those
16 numbers are assembled in some sort of spreadsheet form
17 and uploaded to LiveVox, correct?

18 MR. O'CONNOR: Objection to the form.

19 THE WITNESS: We decide which numbers are going
20 to be dialed, and they are uploaded to LiveVox. I'm
21 not sure of the format they -- they go into LiveVox
22 in, but they go into LiveVox through a format.

23 BY MR. LEMBERG:

24 Q And then LiveVox makes the phone calls?

25 A Correct.

1 you then be able to tell me why this document was
2 produced?

3 A I guess, again, it was because on July -- I'm
4 sorry. It was because the phone number (857) [REDACTED]-8596 is
5 associated with this account.

6 Q Okay. So let's see if we can get this
7 correctly. Does it appear to you, looking at this
8 account history, that Diversified Consultants received an
9 account -- a debt for collection for Rosalee Pagan on
10 July 9th, 2012?

11 A Yes.

12 Q And it proceeded to collect that debt on that
13 same day, correct?

14 A No.

15 Q When did the collection activity start?

16 A The initial attempt at communication was on
17 July 11th.

18 Q Okay. And then Diversified Consultants made an
19 inquiry with a company called Innovis to find additional
20 phone numbers for Rosalee Pagan, correct?

21 A Yes.

22 Q And that -- and that was done on July 15th,
23 2012, correct?

24 A Yes.

25 Q And Innovis is a data provider that -- that

1 enables collectors such as Diversified Consultants to
2 purchase location information, including phone numbers,
3 correct, for a fee?

4 A CBCInnovis is a skip trace service provider?

5 Q Right.

6 A Yes.

7 Q You guys buy -- buy data from them, right?

8 A Yes.

9 Q And among the data that was provided by
10 CBCInnovis is the phone number (857) [REDACTED]-8596, correct?

11 A Yes.

12 Q And then on July 20th, 2012 -- strike that.

13 On August 1st, 2012, that phone number was
14 loaded -- was -- was first called using the LiveVox
15 system, correct?

16 A Every call is made through LiveVox.

17 Q So the answer is yes, right?

18 A Yes.

19 Q And then the LiveVox system proceeded to call
20 several numbers in fact for Rosalee Pagan, the 72 number
21 and the 96 number, correct?

22 A Yes.

23 Q Now, am I correct in reading this chart, the
24 user column indicates the system that is doing the work
25 on the file, in this case on August 1st, LiveVox,

1 correct?

2 A Correct.

3 Q And the comment column either is generated by
4 the collector who is working the file or by the system,
5 correct?

6 A By whom -- whoever is working the file, yes.

7 Q And so let's just look at the first call to the
8 96 number on August 1st, 2012, 8:22 a.m. That call was
9 made by LiveVox and the result of the phone call was a
10 hang up, correct?

11 A Correct.

12 Q And the next call to that phone number was made
13 that same day, on August 1st, by the LiveVox system, and
14 the debtor again hung up the phone, correct, at 8:05
15 p.m., or rather the called party hung up the phone?

16 A Yes.

17 Q So we're reading these things the same way.

18 Now, is there anything here on page 1 or in any
19 other part of this document that tells you that the
20 recipient of these phone calls, 8 -- to the number
21 (857) [REDACTED]-8596 consented to being called by the LiveVox
22 system?

23 A No.

24 Q Do you have any evidence to show that the
25 recipient of these phone calls to the 857 number,

1 (857) [REDACTED]-8596 consented to being called?

2 A No.

3 Q Have you ever had any evidence that the
4 recipient of the phone calls to phone number

5 (857) [REDACTED]-8596 consented to being called by the LiveVox
6 system?

7 A No.

8 Q Am I correct that in order to determine the
9 number of phone calls made by the LiveVox system to the
10 (857) [REDACTED]-8596 number, I would simply go down this chart
11 and count them one by one?

12 A In most cases, yes.

13 Q Unless there are additional phone calls that
14 are made by the dialer that don't make it to this chart,
15 correct?

16 A No, that doesn't happen.

17 Q Well, then, explain to me why you say "in most
18 cases."

19 A We had a note issue in January of 2012 -- or
20 2013, excuse me, that was double noting the accounts.

21 Q Do you see that issue reflected in any records
22 here?

23 A I'd have to look at it more closely. I do not
24 see that issue on this account.

25 Q Do you see any evidence here by looking at

1 Q Do you -- can you tell me what Plaintiffs' 5
2 is?

3 A This is the call recording log for -- from
4 LiveVox system.

5 Q What does that mean?

6 A It's a list of every call that LiveVox made to
7 the specific number requested on specific dates and
8 times.

9 Q And how does Plaintiffs' 5 correspond to
10 Plaintiffs' 4?

11 A If you have a call on the call log, it will
12 appear on the account history as well.

13 Q I'd like for you to please help me out with
14 the column headings in this chart. "Call Center" means
15 the call center to which the phone calls would be routed
16 if someone picked up, correct?

17 A That's the call center that the call is headed
18 to, yes.

19 Q So the LiveVox system is making the call, and
20 if somebody picks up, the call would be routed to DCI
21 Jacksonville, correct?

22 A I don't know if routed is the right word, but
23 it would be -- a Jacksonville representative would take
24 the call.

25 Q So what is the right word?

1 Q Word? You don't? Okay.

2 What about "Caller ID," what does that mean?

3 A That's the number that is appearing on the
4 consumer's caller ID.

5 Q And the "Outcome"?

6 A That's the outcome of the call.

7 Q Now, if I go -- then instead of looking at
8 columns, if I go by rows, each row reflects a phone call
9 made to the 8596 number, correct?

10 A Yes.

11 Q By the LiveVox system, correct?

12 A There could also be inbound calls on here.

13 Q And what -- do you see any inbound calls on
14 here?

15 A I do.

16 Q Show me an inbound call.

17 A The last line on page 1 says, "T-Mobile
18 underscore Sprint underscore IB," for inbound.

19 Q So the person from this number called inbound
20 and was transferred to an operator, correct?

21 A Did not connect, but yes.

22 Q When you say "did not connect," what do you
23 base that on?

24 A There are several factors here. The agent --
25 there's no agent number, and the length of time of the

1 Q Facilitating. So DCI collectors don't make
2 outbound phone calls, correct?

3 A No, they do.

4 Q Well, some do. But most calls are made by
5 LiveVox or through LiveVox?

6 A Through LiveVox.

7 Q Right. So there's a -- LiveVox is a computer
8 that lives in the cloud that makes phone calls for DCI,
9 and then when somebody picks up the phone, the call is
10 then transferred to a DCI collector, correct?

11 A In some circumstances.

12 Q And in other circumstances what happens?

13 A The collector punches in the number on the
14 keypad and says -- hits the call button, and the call is
15 dialed, and the collector hears the phone ring, and his
16 answering machine picks up or --

17 Q Those calls are still made through the use of
18 the LiveVox, correct?

19 A Yes.

20 Q So let's just deal with the -- the first
21 category, the calls that the LiveVox system makes without
22 the collector punching a key of any sort.

23 A I'm sorry --

24 Q In order to do that, in order for the LiveVox
25 system to know which numbers to dial, Diversified

1 we agree on that?

2 A Sure.

3 Q And the file contains phone numbers. Can we
4 agree on that?

5 A Yes.

6 Q And roughly what time does he do that from his
7 home computer?

8 A Between 4:30 and 5:30.

9 Q And those -- that file, what happens, then, to
10 that file?

11 A It's uploaded to LiveVox.

12 Q Uploaded to the LiveVox server, correct, to the
13 cloud?

14 A Correct.

15 Q And what then happens to those numbers?

16 A At the appropriate time that's been designated
17 by the settings that Jamie has installed or set up that
18 morning or however he's done it for the specific amount
19 of calls for whatever campaign he's running, the calls
20 are made.

21 Q So Jamie decides -- has some -- how does he
22 decide what campaign to run?

23 A He's told the day before by our CEO -- or COO,
24 excuse me, and the vice president of operations and
25 president of the company and everybody else who has any

1 input.

2 Q So Jamie gets guidance from upstairs telling
3 him what campaign to run, correct?

4 A Yeah.

5 Q He then decides what phone numbers go into the
6 file, correct?

7 A Uh-huh.

8 Q Then uploads the file to the server run by
9 LiveVox, correct?

10 A Correct.

11 Q And then at the appropriate time, the LiveVox
12 makes the phone calls based on however Jamie designs the
13 campaign for that day, correct?

14 A The campaign and however way he wants --
15 whatever way he wants the calls to be made.

16 Q And between the time that the file is uploaded
17 to LiveVox and the time that the phone calls are made,
18 those phone numbers live on the server, correct?

19 A I'm not sure --

20 MR. O'CONNOR: (Inaudible.)

21 THE WITNESS: Sorry.

22 THE REPORTER: I'm sorry, Mr. O'Connor, did you
23 say something?

24 MR. O'CONNOR: Just an objection to the form.

25 You can answer it, Mavis, if you can.

1 THE WITNESS: I'm not sure if they live on the
2 server or if they are uploaded -- Jamie's got a
3 full-time job. I don't know if he uploads them
4 every hour or every minute or how it's worked, or if
5 they're stored in Latitude until a certain time and
6 then transferred over, or what. I'm not exactly
7 sure.

8 BY MR. LEMBERG:

9 Q Okay. Well, you said there's a computer, a
10 server somewhere, correct?

11 A Right.

12 Q To which Jamie uploads the file, right?

13 A For the calls that are going to be made.

14 Q Right. So once he uploads the file, the file
15 sits in that computer, right? Not in the cloud, it sits
16 on a computer hard disc somewhere?

17 A I'm not sure --

18 MR. O'CONNOR: Objection to the form.

19 THE WITNESS: I'm not sure where it sits. I'm
20 not sure if it sits on a computer, if it sits on the
21 cloud, or if they're in Latitude still until the
22 time they're supposed to be called, then the account
23 number is uploaded.

24 BY MR. LEMBERG:

25 Q Where does Jamie live?

1 A Jacksonville, Florida.

2 Q Do you know if he can be here today?

3 A I think he's on vacation right now. I don't
4 know if he's here today.

5 Q Is he in town?

6 A I don't know. I know he was there yesterday,
7 but he was only there for like an hour.

8 Q Can you call and find out if we can ask him
9 some questions?

10 A I can text him.

11 MR. O'CONNOR: No, that's not going to happen
12 today, Sergei.

13 MR. LEMBERG: Okay. Then, Jack, I'd like to
14 make a joint call to the magistrate in the Mavis
15 case to see if we can clarify this issue. Or we can
16 do it to the district court judge in the -- in the
17 Davis case. Tell me what you prefer.

18 MR. O'CONNOR: We've produced a 30(b)(6)
19 witness who's knowledgeable and happy to answer any
20 questions --

21 MR. LEMBERG: She doesn't know -- no, she's not
22 happy -- Jack, I know she's happy to answer. I'm
23 not saying she's unhappy. I'm telling you she
24 doesn't know -- she -- she's just not a technical
25 person. She doesn't know the answers, the very

1 THE WITNESS: I don't see a reason why I would
2 disagree with it.

3 BY MR. LEMBERG:

4 Q The second sentence -- the second sentence
5 says, "LiveVox is currently DCI's hosted solution where
6 we connect with them via VoIP for cost efficiency." Is
7 that accurate?

8 A We do use LiveVox as our hosted solution via
9 voice over IP.

10 Q Because telecom comes with high volume and
11 low-average balance, you need to make millions of phone
12 calls a day, sometimes we could do -- something we could
13 not do when operating through a premise-based system.
14 Any disagreement with that?

15 MR. O'CONNOR: Objection to form.

16 THE WITNESS: I do disagree with this.

17 BY MR. LEMBERG:

18 Q Okay. Well, tell me why you disagree with
19 this.

20 A Because it says you need the ability to make
21 millions of phone calls a day.

22 Q Okay.

23 A I think you said you need to make millions --
24 you know.

25 Q Does that -- does that sentence mean to you

1 that Diversified Consultants makes millions of phone
2 calls a day?

3 A No, it means we have the ability to make
4 millions of phone calls a day.

5 Q Okay. You need the ability to make millions of
6 phone calls a day, right?

7 A Correct.

8 Q And so in order to make millions of phone calls
9 a day, is it fair to say that Jamie would have to
10 download some number that is -- download some large
11 number of phone numbers into the dialer so that it could
12 make those phone calls?

13 A He would have to upload a large number of files
14 or large groups of files.

15 Q Right. And those groups of files, individual
16 files have phone numbers in them, correct?

17 A I'm not sure if they have phone numbers or
18 account numbers, or -- and that's --

19 Q Hold on.

20 A I'm not sure on -- okay. Let me --

21 Q In order for the dialer to dial, what is it
22 dialing? It's not dialing account numbers.

23 A No, it's dialing a phone number.

24 Q Right. So the files have phone numbers,
25 right?

1 A No.

2 Q Can you estimate how many numbers are loaded
3 into the LiveVox dialer on a daily basis?

4 A Can I estimate?

5 Q Yes.

6 A It would be more of a guesstimate, but ...

7 Q Tell me.

8 A I'd say over a million.

9 Q On a daily basis?

10 A It's a guesstimation, but yes.

11 Q What's the over/under on that? It could be off
12 by 200,000s.

13 A I mean, it could be off -- it could be off by
14 millions. I don't know.

15 Q But in order to make millions of phone calls a
16 day, you need some number that's more than --

17 A One.

18 Q Well, your system doesn't -- I mean, let's be
19 realistic. It's some number above 100,000, right?

20 MR. O'CONNOR: Objection to the form.

21 THE WITNESS: To make phone calls -- to make
22 millions of phone calls a day --

23 BY MR. LEMBERG:

24 Q Right.

25 A -- if we're making millions of phone calls a

1 day, you're going to have to dial a million phone
2 numbers.

3 Q Okay. Now, those phone numbers are contained
4 within the files that are uploaded to LiveVox, correct?

5 A I -- yes.

6 Q Now, since LiveVox is a computer -- okay. Let
7 me ask you a question. Let the record reflect that I am
8 holding a cup of coffee in my hand and I'm asking the
9 witness to look at the cup of coffee and answer my
10 question, and the question is as follows: Does this cup
11 of coffee have the capacity to store the coffee that is
12 in it?

13 A Yes.

14 Q Because if it didn't store it, there would be a
15 hole and it would be coming out on the other end,
16 right?

17 A Correct.

18 Q Now, the numbers that are downloaded into the
19 LiveVox -- uploaded, rather, into the LiveVox dialer by
20 Jamie, they sit there in that dialer, correct, until they
21 are dialed?

22 MR. O'CONNOR: Objection to the form.

23 THE WITNESS: I don't know.

24 BY MR. LEMBERG:

25 Q Is the LiveVox dialer like the cup of coffee

1 topics. And you can click the link to go to uploading a
2 campaign.

3 Q So which -- which PA number?

4 A PA 32 is the start of it.

5 Q Why don't we go PA 31 instead. Would you
6 please read that section and tell me -- and then tell me
7 when you're ready.

8 A Okay.

9 Q Can you explain to me what this section
10 means?

11 A That means that we have the option to store
12 information or phone numbers into the system, LiveVox
13 system, for up to 30 days.

14 Q And they can reside there, the campaigns, for
15 up to 30 days, correct?

16 A At our choice.

17 Q And data reports exist beyond the 30-day limit,
18 correct?

19 A Data reports on how -- on what was done, yes.

20 Q But it seems to me that this PA 31 means that
21 the LiveVox dialer that -- for which this manual is the
22 manual has the capacity to retain the files for 30 -- for
23 up to 30 days, correct?

24 A It has the capacity to obtain -- retain them
25 for up to 30 days.

1 Q Okay. Now, what do the words "upload the
2 file" -- you pointed me to page 32. What do the words
3 "upload the file" mean?

4 A Uploading a campaign or file would be the
5 numbers we want to call, uploading it to the system.

6 Q So taking it from your system and moving it to
7 somebody else's, right?

8 A Yeah, or putting in the FTP and taking -- yeah.

9 Q All right. When the file is -- looking at page
10 PA 32, there's a heading called "Uploading a Campaign."
11 Can you explain to me how this process works looking at
12 this manual?

13 A If I took the time to read it, I would be able
14 to, yes. This is a step-by-step on how to upload a file,
15 yeah.

16 Q Right. So you take the file, you select it
17 from your system, correct?

18 A Right.

19 Q And then you upload it to their system,
20 right?

21 A Yeah. Well -- yeah.

22 Q And that's what Jamie does, does he not?

23 A Yeah.

24 Q And then the file, then, is -- sits on their
25 system until the numbers are dialed, correct?

1 A Or until it expires based on the shelf life
2 that we've preassigned.

3 Q Right. And right at the bottom here it talks
4 about archiving. And it says, "Completed and reported
5 files older than the current date are archived; these
6 files will only be displaced until their shelf life
7 expires." Do you see that?

8 A Yes, I do.

9 Q So the -- the LiveVox system has the capacity
10 to archive these files, does it not?

11 A Yes.

12 Q And when I -- when it says "archive," that
13 means retain on the system, correct?

14 A Archive is retain old information that's not
15 usable. It's like --

16 Q Is it any different than the library, for
17 instance? You can have a book and an archive. You can
18 have a file here and an archive, right?

19 A Here's -- here's how I would describe it: You
20 have a child. The child outgrows a pair of shoes, but
21 you save them. You get them bronzed. They're now
22 archived. They're not something you're going to use
23 every day anymore. They're something your child's never
24 going to wear again. No child will ever wear them
25 again.

1 another specification for how dialing is to be done; true
2 or false?

3 A False, because we don't use their standard.

4 MR. O'CONNOR: Objection to the form.

5 BY MR. LEMBERG:

6 Q But their standard is to dial sequentially;
7 true or false?

8 MR. O'CONNOR: Objection to the form.

9 THE WITNESS: LiveVox has a standard of dialing
10 sequentially. Diversified Consultants does not use
11 their standard.

12 BY MR. LEMBERG:

13 Q Diversified Consultants use -- uses a different
14 strategy for how it assigns when phone calls are made,
15 correct?

16 A Correct.

17 Q But the LiveVox system has the capacity to dial
18 sequentially, does it not?

19 A I guess, yeah.

20 Q Is that yes?

21 A Yes.

22 Q In fact, that's their default option, is it
23 not?

24 A Correct.

25 Q Are you familiar with the term "preview

C E R T I F I C A T E O F O A T H

STATE OF FLORIDA)

COUNTY OF DUVAL)

I, the undersigned authority, certify that MAVIS-ANN
PYE personally appeared before me and was duly sworn on
Friday, February 28, 2014.

WITNESS my hand and official seal this 4th day of
March 2014.

Tanya L. McCranie
Notary Public - State of Florida
Commission No.: FF 049175
Expires: October 26, 2017

Personally known:
Produced Identification: XX
Type of Identification Produced: Florida Driver's License

C E R T I F I C A T E

STATE OF FLORIDA)

COUNTY OF DUVAL)

I, TANYA L. McCRANIE, Registered Merit Reporter, certify that I was authorized to and did stenographically report the deposition of MAVIS-ANN PYE; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with this action, nor am I financially interested in the action.

DATED this 4th day of March 2014.

Tanya L. McCranie, RMR